## REMARKS/ARGUMENTS

In response to the Office Action dated September 17, 2003, please consider the following remarks.

In the Office Action issued September 17, 2003, claims 1-2, 5-7, 11-12, 15-17, 21-22, and 25-27 were rejected under 35 U.S.C. §102(b) as being anticipated by Simoudis et al., U.S. Patent No. 5,692,107 (Simoudis). Claims 3-4, 8-10, 13-14, 18-20, 23-24, and 28-48 were rejected under 35 U.S.C. §103(a) as being unpatentable over Simoudis in view of the article by Cooley et al. (Cooley). Claims 1-2, 5-8, 11-12, 14-18, 21-22, 25-28, and 39-48 were rejected under 35 USC §112 ¶ as being incomplete for omitting essential structural cooperative relationships of element. Claims 1-2 and 5-7 were rejected under 35 USC §101 as being directed to non-statutory subject matter.

Claims 1, 4, 6-11, 14, 16-21, 24, 26-31, 34, 36-40, and 42-48 are now pending in this application. Claims 2-3, 5, 12-13, 15, 22-23, 25, 32-33, 35, and 41 have been canceled. Claims 1, 11, 21, and 31 have been amended in order to clarify the subject matter that the applicant considers to be the invention, to clarify the structural relationships of the elements and to ensure that the claims are directed to statutory subject matter. Claims 4, 6, 14, 16, 24, 26, 34, 36, and 42 have been amended to correct dependencies.

Each of the claims now pending in this application is believed to define an invention that is novel and unobvious over the prior art. Favorable reconsideration of this case is respectfully requested.

The present invention is not anticipated by, nor obvious in view of, the references relied upon in the Office Action, as these prior art references do not disclose or suggest the claimed features of the present invention.

The Applicant respectfully submits that the present invention according to claims 1-2, 5-7, 11-12, 15-17, 21-22, and 25-27 is not anticipated by Simoudis. The rejection of claims 5, 15, and 25 is moot as those claims have been canceled.

Simoudis discloses a data mining system including a user interface, a plurality of data sources, at least one top-down data analysis module and at least one bottom-up data analysis module in cooperative communication with each other and with the user interface, and a server processor in communication with the data sources and with the data analysis modules. Simoudis discloses a data mining method involving the integration of top-down and bottom-up data mining techniques to extract predictive models from a data source. A data source is selected and used to construct a target data set. A data analysis module is selected and module specific parameters are set. The selected data analysis module is applied to the target data set based on the set parameters. Finally, predictive models are extracted based on the target data set.

By contrast, the present invention, for example, according to claim 1, requires collecting data from a plurality of data sources, including at least one web-based data source and comprising proprietary account or user-based data, complementary external data, web server data, and web transaction data, and wherein the collecting step comprises the steps of acquiring data from the plurality of data sources, selecting data that is relevant to a desired output from among the acquired data, pre-processing the selected data, and building a plurality of database tables from the pre-processed selected data, wherein the acquired data comprises a plurality of different types of data, integrating the collected data, wherein the integration step comprises the step of forming an integrated database comprising collected data in a coherent format, generating a plurality of data mining models using the collected data, and generating a prediction or recommendation using at least one of the plurality of generated data mining models, in response to a received request for a recommendation or prediction.

Simoudis does not disclose or suggest collecting data from a plurality of data sources, including at least one web-based data source and comprising proprietary account or user-based data, complementary external data, web server data, and web transaction data. Simoudis does not disclose or suggest data mining of data sources on the web. In addition, Simoudis does not disclose or suggest web data sources including web server data and web transaction data. Likewise, Simoudis does not disclose or suggest the use of complementary external data,

which is data acquired from external sources that is complementary to the proprietary account or user-based data. Simoudis does disclose that data may have patterns that can be validated or explored, but this does not disclose or suggest complementary external data.

Simoudis does not disclose or suggest integrating the collected data, wherein the integration step comprises the step of forming an integrated database comprising collected data in a coherent format. Simoudis does disclose using data that is in a database, but Simoudis does not disclose or suggest how the database was generated. In particular, Simoudis does not disclose or suggest integrating the collected data, which includes different types of data and which have different formats, into a database that has a coherent format. Simoudis only discloses using a database, which may be assumed to already have a coherent format.

Thus, the present invention, according to claims 1, 11, and 21 is not anticipated by Simoudis. Likewise, the present invention, according to claims 2 and 5-7, which depend from claim 1, claims 12 and 15-17, which depend from claim 11, and claims 22 and 25-27, which depend from claim 21, is not anticipated by Simoudis.

The Applicant respectfully submits that the present invention according to claims 3-4, 8-10, 13-14, 18-20, 23-24, 28-48 were rejected under 35 U.S.C. §103(a) as being unpatentable over Simoudis in view of Cooley because even if the combination of King and Montgomery suggested by the Examiner were made,

the result would not be the present invention, as claimed. The rejection of claims 3, 13, 23, 25, 32-33, 35, and 41 are moot because those claims have been canceled.

Cooley discloses web mining, that is the application of data mining techniques to the World Wide Web. Cooley discloses two distinct types of web mining - web content mining, which is the process of information discovery form sources across the web, and web usage mining, which is the process of mining for user browsing and access patterns. As disclosed by Cooley, these two types of web mining are distinct and Cooley does not disclose or suggest performing web mining that combines the two.

By contrast, the present invention, for example, according to claim 1, requires collecting data from a plurality of data sources, including at least one web-based data source and comprising proprietary account or user-based data, complementary external data, web server data, and web transaction data, and wherein the collecting step comprises the steps of acquiring data from the plurality of data sources, selecting data that is relevant to a desired output from among the acquired data, pre-processing the selected data, and building a plurality of database tables from the pre-processed selected data, wherein the acquired data comprises a plurality of different types of data, integrating the collected data, wherein the integration step comprises the step of forming an integrated database comprising collected data in a coherent format, generating a plurality of data mining models using the collected data, and generating a prediction or

recommendation using at least one of the plurality of generated data mining models, in response to a received request for a recommendation or prediction.

Cooley does not disclose or suggest collecting data from a plurality of data sources, including at least one web-based data source and comprising proprietary account or user-based data, complementary external data, web server data, and web transaction data and forming an integrated database comprising collected data in a coherent format. Cooley discloses two distinct types of web mining - web content mining and web usage mining. As disclosed by Cooley, these two types of web mining are distinct and Cooley does not disclose or suggest performing web mining that combines the two. In addition, Cooley does not disclose or suggest performing data mining on the combination of web content mining, web usage mining, proprietary account or user-based data, and complementary external data, as is required by the present invention.

Thus the combination of Simoudis and Cooley does not disclose or suggest these required elements of claim 1, nor of claims 11, 21, and 31, which are similar to claim 1. Therefore, the present invention according to claims 4 and 8-10, which depend from claim 1, claims 14 and 18-20, which depend from claim 11, claims 24 and 28-30, which depend from claim 19, and claims 34, 36-40, and 42-48, which depend from claim 31, is not obvious over Simoudis in view of Cooley.

In view of the above, it is respectfully submitted that the present invention is allowable over the references relied upon in the Office Action. Accordingly,

favorable reconsideration of this case and early issuance of the Notice of Allowance are respectfully requested.

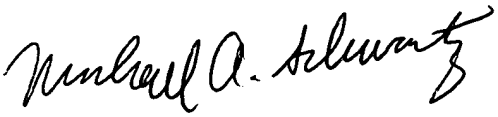
**Additional Fees:**

The Commissioner is hereby authorized to charge any insufficient fees or credit any overpayment associated with this application to Deposit Account No. 19-5127 (19111.0049).

**Conclusion**

In view of the foregoing, all of the Examiner's rejections to the claims are believed to be overcome. The Applicants respectfully request reconsideration and issuance of a Notice of Allowance for all the claims remaining in the application. Should the Examiner feel further communication would facilitate prosecution, he is urged to call the undersigned at the phone number provided below.

Respectfully Submitted,



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